

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

MARTIN O. LONG,

\*

Plaintiff,

\*

vs.

\*

Case Number: 2:06cv816-MHT

STATE FARM FIRE AND  
CASUALTY COMPANY,

\*

\*

Defendant.

**INITIAL DISCLOSURES OF STATE FARM FIRE AND CASUALTY COMPANY**

In accordance with Fed. R. Civ. P. 26(a)(1), Defendant State Farm Fire and Casualty Company ("State Farm") hereby makes the following initial disclosures:

A. The below-described individuals are likely to have discoverable information that State Farm may use to support its defenses:

1. Martin Long (Plaintiff)
2. Todd Smith (Claims Representative)
3. Tony Nix (Claim Team Manager - Special Investigations Unit)
4. David Thomas (Claim Section Manager)
5. Cathy Sims (Auto Underwriting Team Manager)
6. Bob Grumblatt (Claim consultant)
7. Earl Hyser (State Farm vehicle research facility)
8. Jeff Crow  
David Fisher  
Jon Hatch  
Lloyd Renfrow

Logan Smith  
Nancy Stevens  
Bret Suiter

The individuals described in numbers 2-8 above can be reached through State Farm's counsel.

9. Ram Naidu (Employee of the Country Hearth Inn at time of alleged theft and possible witness to circumstances surrounding alleged theft); Anna Jacobo (Manager of the Country Hearth Inn at time of alleged theft and possible witness to circumstances surrounding alleged theft):

Country Hearth Inn  
5400 Fairington Road  
Lithonia, GA 36054  
334-290-0344

10. Evelyn Long (Plaintiff's spouse):  
1705 Deatsville Hwy  
Millbrook, AL 36054  
334-290-0344

11. Valerie Ware-Temple (Possible witness to circumstances surrounding alleged theft):

6936 Winton Blount Blvd.  
Montgomery, AL 36117  
334-260-2288

12. Donald Ware (Possible witness to circumstances surrounding alleged theft):

2850 Norfair Loup  
Lithonia, GA  
678-887-1851

13. Ricky Ware (Possible witness to circumstances surrounding alleged theft):

10840 Rhodes Ln.  
Montgomery, AL 36117  
334-451-0045

14. Mike Bresnock (Performed independent test on insured vehicle):

Transportation Technology, Inc.  
1184 Wind Hill Lane  
Marietta, GA 30064  
770-426-6173

15. Dekalb County Sheriff's Department, GA (Investigated alleged theft):

Address unknown

16. Dekalb County Police Department, GA (Investigated alleged theft):

Address unknown

B. The below-described documents, data compilations, and tangible things that are in State Farm's possession, custody, or control may be used by State Farm to support its defenses:

1. All documents contained in State Farm's claims file for Long's claim made under his automotive policy, with the exception of any attorney/client and work product privileged documents.

2. All documents contained in State Farm's claims file for Long's claim made under his homeowner's policy, with the exception of any attorney/client and work product privileged documents.

The documents described in numbers 1-2 above are in the possession of State Farm's counsel.

C. State Farm has made no claim for damages in this action.

D. Excepting the automobile policy involved in this suit, State Farm has no insurance agreement covering its possible liability in this action.

E. A privilege log is being provided to counsel for Plaintiff.

s/ James B. Newman  
JAMES B. NEWMAN (NEWMJ8049)  
Attorney for Defendant State Farm Fire  
and Casualty Company

OF COUNSEL:  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

F. Tucker Burge  
Burge & Burge  
2001 Park Place North, Suite 850  
Birmingham, Alabama 35203

done this 31<sup>st</sup> day of October, 2006.

s/James B. Newman  
OF COUNSEL

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